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DATE: DECEMBER 04, 1993
FROM: PETER GURIA, OSC REGION V, RS1, GROSSE ILE, MI

TO: D.DIETRICH/ATTN: T.JOHNSON, USEPA, OSWER, WASH.D.C..... (VIA FAX)
R.BOWDEN, CHIEF, EERB, CHICAGO, IL..... (VIA FAX)
R.POWERS, EERB, CHIEF RS-1, (MI-OH), GROSSE ILE, MI..... (VIA FAX)
M.McCUE/ATTN: L.LEVEQUE, OFF. PUB. AFF. CHICAGO, IL..... (VIA FAX)
T.KRUEGER-ATTN: T.BRANIGAN, ORC, CHICAGO, IL..... (VIA FAX)
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J.REARDON, DETROIT FIRE DEPT..... (US MAIL)
P.MAX, DETROIT DEPT. COMM.& IND. HYGIENE, CITY OF DET... (VIA FAX)

SUBJECT: ENTERPRISE OIL REMOVAL ACTION-PHASE I, DETROIT, MI
POLREP NO.: FINAL PHASE I SITE ID: PG D.O.: 7640-05-232
RESPONSE AUTHORITY: CERCLA NPL STATUS: NO
LATITUDE: 42°23'47" LONGITUDE: 83°07'28"
START DATE: 06/16/92
COMPLETION DATE:

1. SITUATION:

- A. AFFIXED "CAUTION" SIGNS ON FENCE SURROUNDING SITE PERIMETER 9/24/92.
- B. PHASE I ACTIVITY COMPLETED 12/4/92. DEMOBED ON-SITE SECURITY SERVICE. SITE HAS REMAINED SECURE.

2. ACTIONS TAKEN:

- A. COLLECTED ADDITIONAL COMPOSITE SAMPLE OF SLUDGE WASTE STORED IN FRAC TANK FOR SUBMITTAL TO LABORATORY FOR ANALYTICAL 9/24.
- B. MOBED 2 ERCS CREW MEMBERS TO SITE AND COMPLETED FINAL GRADE OF SITE 9/30. DEMOBED 2 ERCS CREW MEMBERS IN PM.
- C. SHIPPED FINAL LOAD OF SCRAP METAL FOR RECLAMATION 10/6. RECEIVED PARTIAL PAYMENT.
- D. COLLECTED COMPOSITE SAMPLES OF SLUDGE WASTE FROM FRAC TANK AND SUBMITTED TO A TOTAL OF FIVE DISPOSAL FACILITIES FOR ACCEPTANCE 10/26 AND 11/2.
- E. DISPOSAL ACCEPTANCE FOR THE SLUDGE WASTE STREAM WAS RECEIVED FROM CLARK PROCESSING 11/23/92. MOBED 3 ERCS MEMBERS TO SITE 12/2/92 TO CONDUCT WASTE SHIPMENT ACTIVITIES. DUE TO VISCOSITY OF MATERIAL WASTE WAS LOADED FROM FRAC TANK INTO TWO METROPOLITAN TANKER TRUCKS BY USE OF VAC TRUCK 12/2/92. SHIPPED A TOTAL 8,000 GALLONS OF WASTE SLUDGE TO CLARK PROCESSING FOR FUELS BLENDING WHICH WAS RECEIVED 12/2/92 PM. THE MATERIAL CONTAINED 100 PPM OF TCE WHICH EXCEEDS CLARK'S PERMIT LEVEL FOR NON-HAZ MATERIAL. THE FACILITY REJECTED THE SHIPMENT AND ALSO REFUSED TO ACCEPT THE MATERIAL AS HAZARDOUS BECAUSE IT WAS TOO VISCOUS. THE MATERIAL WAS TRANSFERRED TO USPCI, EAST CHICAGO, INDIANA, 12/4/92. THE FACILITY HAD PREVIOUSLY APPROVED DISPOSAL AS A D007 AND D008 WASTE. THE VISCOSITY OF THE MATERIAL CAUSED OFF-LOADING PROBLEMS. FINAL DISPOSAL FINALLY OCCURRED AT 2300 HOURS 12/4/92.

- F. COMPLETED DECON OF FRAC TANK. DEMOBED 3 ERCS CREW MEMBERS 12/3/92.
- G. DEMOBED FRAC TANK 12/3/92, DEMOBED COMMAND POST TRAILER, CITY DUMPSTER, AND PORT-O-LET 12/4/92. THE CITY OF DETROIT TERMINATED POWER ON-SITE 12/7/92.

3. PLANS:

- A. OSC HAS UNSUCCESSFULLY TRIED TO RECEIVE PAYMENT FOR REMAINING LOADS OF SCRAP METAL SHIPPED TO VITO'S SALVAGE FOR RECLAMATION. VITO HAD PROMISED TO PROVIDE WEIGHT TICKETS FOR THE LAST 4 SHIPMENTS OF SCRAP, AND SUBMIT PAYMENT FOR PAST DUE LOADS BUT HAS FAILED TO DO SO AS OF THIS DATE. THE OSC IS CONSIDERING REFERRAL TO THE OFFICE OF THE INSPECTOR GENERAL.
- B. OSC TO ISSUE DELIVERY ORDER TO NEW ERCS CONTRACTOR - RIEDEL TO BEGIN TREATABILITY STUDIES IN PREPARATION OF THE BIOREMEDIATION PHASE TENTATIVELY SCHEDULED FOR SPRING OF 1993.

4. KEY ISSUES:

- A. DUE TO SUBSEQUENT PROBLEMS WITH I.T DISPOSAL COORDINATION, ADDITIONAL COMPOSITE SAMPLES HAD TO BE COLLECTED OF THE WASTE OIL AND SLUDGE, AND RESUBMITTED TO FACILITIES FOR DISPOSAL APPROVAL WHICH PROLONGED DISPOSAL OF THE WASTE. ADDITIONAL COSTS WERE INCURRED BY RE-MOBILIZING CREW MEMBERS FOR FINAL DISPOSAL ACTIVITIES.

5. ESTIMATED COSTS:

	BUDGETED	TOTAL TO DATE	REMAINING
ERCS	\$1,200,000.00	*\$ 621,701.48	\$ 578,298.52
TAT	\$ 342,000.00	**\$ 126,947.23	\$ 215,052.77
EPA	\$ 163,400.00	***\$ 25,970.00	\$ 137,430.00
TOTAL:	\$1,705,400.00	\$ 774,618.71	\$ 930,781.29

* ERCS COSTS TAKEN FROM 1900-55 DATED 10/30/92 AND TOTAL INCLUDES \$ 24,432.01 IN AWAIT BILLS.

** INCLUDES COSTS INCURRED THROUGH 12/26/92 AS STATED FROM THE TAT REGIONAL RORIS PRINTOUT. TAT COSTS INCLUDES MULTIPLIER COSTS.

*** INCLUDES COST INCURRED THROUGH 1/9/93.